

## **PRIVACY POLICY**

### **WHO ARE WE?**

Altenburg Advisory LLP (“Altenburg, We or Us”) based at 16 Old Queen Street, London, SW1H 9HP, advises on, structures, and arranges debt funding solutions for UK businesses.

### **THE DATA CONTROLLER**

For the purpose of the Data Protection Act 2018 (the Act), the data controller of the personal data you submit to this site is Altenburg Advisory Limited (i.e. we are responsible for, and control the processing of, your personal information). Further information can be obtained by contacting us. (See the “How to Contact Us” section below.)

### **WHAT THIS POLICY COVERS**

This policy covers without limitation, the home page, splash page and all other pages under the domain name [www.altenburgadvisory.com](http://www.altenburgadvisory.com) (“our site”) and all content contained on those pages.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed and used by us.

### **1. INFORMATION WE MAY COLLECT FROM YOU**

#### **Information you give us.**

You may give us information about you by filling in forms on our site or forms that we have given to you to fill in (which may be part of your agreement with us) by communicating or corresponding with us via phone or email or other means. This includes information you provide when you register to use our site, log in to a service, subscribe to a service and when you report an issue with our site. The information you give us may include:

- your name
- email address
- phone number
- job position
- your organisation’s financial information
- information about your organisation’s investment strategies and objectives
- any further personal information required as part of a debt raising process

#### **Information we collect about you.**

Each time you visit our site we may automatically collect the following information:

- technical information including the internet protocol (IP) address used to connect your computer to the internet, your log-in information, browser type and version, browser plug-in types and versions, time zone setting, operating system and platform; and
- information about your visit, including the Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); items you searched for; page response times; download errors, length of time spent on pages, page interaction information (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page and any phone number used to call us.

#### **Special Category Data.**

We do not collect special category data such as biometric data for unique identification, health information and medical records, criminal records, racial or ethnic origin, political orientation or beliefs, religious or

philosophical beliefs, trade union membership, data concerning sex life or sexual orientation, genetic data, nor do we require you to give us this data.

#### **Information we receive from other sources.**

We work closely with institutional capital providers such as banks and other financial institutions which facilitate loans and other such financial arrangements (“Capital Providers”) as well as with a host of other third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers). We receive personal data from these third parties from time to time. We may combine this information with information you give to us and information we collect about you. We may use this information and combined information for the purposes set out in the “How We Use Your Information” section below (depending on the types of information we receive).

#### **Monitoring and recording communications.**

We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention and compliance with our obligations under applicable legislation.

#### **Personal information about other individuals.**

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- give consent on his/her behalf to the processing of his/her personal data;
- receive on his/her behalf any data protection notices; and
- give consent to the processing of his/her personal data which may include all of the information listed above.

## **2. COOKIES**

### **Types of Cookies**

The following table sets out details on the type of cookies and how we use the different categories of cookies as well as providing information on your options for managing cookies’ settings.

Cookies	Description	Managing Settings
Required Cookies	Required cookies enable you to navigate our site and use its features, such as to uniquely identify you to process your online transactions and requests.	Because required cookies are essential to operate our site, there is no option to opt out of these cookies.
Functionality Cookies	These are used to recognise you when you return to a website. This enables personalisation of content for you (for example, your choice of language and region)	We do not use Functionality cookies.
Targeting or Advertising Cookies	These are cookies delivered by third-parties to show ads for products and services that the website provider thinks may interest you on any devices you may use and to track the performance of advertisements. For example, in these cases, cookies remember information such as which browsers have visited that website. The information provided to third-parties does not include personal information, but this information may be re-associated with personal information after the website provider receives it.	We do not use targeting or advertising cookies.

Our site only uses required cookies.

## **Do Not Track Features.**

Some browsers incorporate a “Do Not Track” feature that, when turned on, is intended to signal to sites and online services that you do not want to be tracked. Because there is not yet an industry-standard protocol for responding to these “Do Not Track” signals, our information collection practices on our site will continue to operate as described in this Cookie Policy and in our Privacy Policy regardless of any “Do Not Track” signals that may be sent.

## **Further information on how to turn off cookies.**

You can get further information about cookies generally and how to disable them on the following website: [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **3. HOW WE USE YOUR INFORMATION**

We use information which you have given to us, and we have collected and hold about you in the following ways:

- to carry out our obligations arising from any contracts entered into between you and us;
- to approach Capital Providers on your behalf to obtain quotations for commercial financial products;
- to complete Capital Provider’s application forms on your behalf;
- to engage with Third Party Advisors and get input from them to obtain recommendations for debt funding solutions and other providers of debt funding solutions; to comply with our legal obligations to carry out identity and anti-money laundering checks;
- to notify you about changes to our service;
- to administer our site and for internal operations including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and your computer; and
- as part of our efforts to keep our site safe and secure;

Where we complete Capital Provider’s application forms on your behalf or provide these forms for you to complete and we then pass the completed forms back to the Capital Provider, we are acting only as a processor of the information in the completed forms. The Capital Provider is the controller of the personal data in the completed application forms. You should read the Capital Provider’s privacy policy or contact the Capital Provider directly for more information about what they do with your personal data.

For some personal data we collect from you (e.g. your name and contact details) we are a controller in common with the Capital Provider. This means that both us and the Capital Provider collect and use the same personal data but for different purposes. We use the personal data for the purposes set out above. For more information on the purposes for which the capital provider uses that personal data you should read the Capital Provider’s privacy policy or contact the Capital Provider directly for more information.

Where we engage with Third Party Advisors, we and they may share some of your personal data (such as name and contact information, job position, your organisation’s financial information and information about your organisation’s investment strategies and objectives, and other personal information required as part of a debt raising process). The Third Party Advisors use this personal data (“shared personal data”) for the same purposes as we do and are therefore joint controllers of such personal data.

For more information on how we managed the Shared Personal Data you can contact us (see the “How to Contact Us” section below) or the Third Party Advisor using the contact information in their privacy policy.

## **4. MARKETING**

We would like to send you information by post, email, telephone, text message (SMS) or automated call about our products and services which may be of interest to you.

We rely on our legitimate interests to send these messages to you. See the “Legitimate Interests” section below for more information.

## **5. LEGITIMATE INTERESTS**

We process personal data for certain legitimate business purposes, which include some or all of the following:

- where the processing enables us to enhance, modify, personalise or otherwise improve our services' communications for the benefit of our customers;
- to identify and prevent fraud;
- to enhance the security of our network, information systems and the services we provide;
- to better understand how people interact with our site and our services;
- to provide communications which we think will be of interest to you e.g. newsletters, case studies and special offers.

“Legitimate Interests” means the interests of our company in conducting and managing our business to enable us to give you the best service/products and the best and most secure experience.

When we process your personal data for our legitimate interests, we make sure to consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. Our legitimate business interests do not automatically override your interests - we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

You have the right to object to this processing if you wish, and if you wish to do so, please see the “Your Rights” section below. Please bear in mind that if you object this may affect our ability to carry out tasks above for your benefit and may defeat the object of your participation in the forum offered through our site.

## **6. DISCLOSURE OF YOUR INFORMATION**

We may share your personal information with:

- our business partners including Capital Providers and Third Party Advisors;
  - suppliers and sub-contractors for the performance of any contract we enter into with them or you;
  - in the event that we buy or sell 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 requested by regulatory agencies, or in order to enforce or apply our letter of engagement or other agreements or to protect the rights, property or safety of Altenburg. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
- financial institutions and other similar organisations (Including Capital Providers) that we deal with in the course of the services we offer; and
- auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes, in any jurisdiction where we operate.

When we share your information with third parties, they will process your information either as a data controller or as our data processor and this will depend on the purpose of our sharing the personal data. We will only share your personal data in compliance with the applicable data protection legislation. A list of our selected third parties with whom we may share your information is available by contacting us. Please also see the section on “How We Use Your Information” about personal data provided to and or shared with Capital Providers and Third-Party Advisors.

## **7. WHERE WE STORE YOUR PERSONAL DATA**

All information you provide to us is stored on our secure servers located in the United Kingdom and European Economic Area (EEA). It will also be processed by staff operating inside the UK or the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the provision of our site and the forum including support services and the processing of your payment details.

You can obtain more information about the locations where your data is stored and transferred to, including the identity of third-party suppliers and their locations and processing activities by contacting us please. See “How to Contact Us” below.

## **8. TRANSFERS OF YOUR INFORMATION OUT OF THE EEA**

Wherever we are required to transfer your personal data, regardless of where this occurs, we have taken steps to ensure that your information is treated securely and in accordance with this privacy policy and all applicable data protection laws and regulations including entering into European Commission approved contracts that that will safeguard your privacy rights and give you remedies in the unlikely event of a security breach.

We do not transfer your information outside of the United Kingdom or outside of the EEA other than in accordance with an agreement you have with us. Details of any third parties located outside of the EEA to which your personal data is transferred will be communicated to you in accordance with the terms of the agreement with you.

## **9. SECURITY**

### **What we do:**

We will use technical and organisational measures to safeguard your personal data, for example we store your personal data on secure servers.

While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet. If you have any particular concerns about your information, please contact us (see “How to Contact Us” section below).

## **10. YOUR RIGHTS**

Right to ask us to stop contacting you with direct marketing

Even if you have agreed to processing of your personal data for marketing purposes (by ticking the relevant box), you have the right to ask us to stop processing your personal data for such purposes. Where we are relying on our legitimate interests to send you marketing material you can object (see below). Let us know what method of contact you are not happy with if you are unhappy with certain ways of contacting you only (for example, you may be happy for us to contact you by email but not by telephone). You can exercise this right at any time by contacting us.

Right to request a copy of your information

You can request a copy of your information which we hold (this is known as a subject access request). If you would like a copy of some of it, please contact us and let us know the information you want a copy of, including any account or reference numbers, if you have them.

Right to correct any mistakes in your information

You can require us to correct any mistakes in your information which we hold free of charge. If you would like to do this, please contact us, and let us know the information that is incorrect and the information you want it replaced with.

### **Right to request we cease processing your information**

You may request that we cease processing your personal data. If you make such a request, we shall retain only the amount of personal data pertaining to you that is necessary to ensure that no further processing of your personal data takes place.

### **Data Portability Request**

You have rights to obtain a copy of some of the personal data that we hold on you and reuse or share it for your own purposes (“right to data portability”). The right to data portability only applies:

- to personal data you’ve provided to us (i.e. not any other information),
- where we are processing your personal data because you have provided your consent for us to do so, or under a contract with you; and
- when processing is carried out by automated means.

We can refuse your data portability request if the processing does not satisfy the above criteria. Also, if the personal data concerns more than one individual, we may not be able to transfer the information to you if doing so would prejudice the other person’s rights.

### **Right to request deletion of your information**

You can ask us to erase all your personal data (also known as the “right to be forgotten”) in the following circumstances:

- it is no longer necessary for the Manager to hold that personal data with respect to the purpose for which it was originally collected or processed;
- you wish to withdraw your consent to us holding and processing your personal data;
- you object to us holding and processing your personal data (and there is no overriding legitimate interest to allow us to continue doing so);
- the personal data has been processed unlawfully; or
- the personal data needs to be erased in order for us to comply with a particular legal obligation.

Unless we have reasonable grounds to refuse to erase your personal data, all requests for erasure shall be complied with.

## **12. FOR HOW LONG DO WE KEEP YOUR DATA**

We only keep your information for so long as it is necessary to fulfil the purpose for which it was collected which in most circumstances would be for so long as you have a valid account with us. There are regulatory and legislative requirements which oblige us to keep certain data for longer, and in order to comply with those regulatory requirements we keep that data for seven years. We regularly review our retention obligations to ensure we don’t keep personal information longer than we’re legally obliged to.

### **We use the following criteria to determine how long we should keep your data for:**

- So long as we are providing our services to you;
- Whether or not you are actively using your account;
- Whether or not you are opening emails that we send to you with communications we think you are interested in;
- If we are required by law to keep your information for a certain period of time; and
- If we will need to keep copies of correspondence with you to resolve complaints.

## **13. CHANGES TO OUR PRIVACY POLICY**

We may change this privacy policy from time to time. Any changes to our privacy policy in the future will be posted on this page and where appropriate notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

## **14. HOW TO CONTACT US**

If you have any questions about this privacy policy, or the information we hold about you, please send an email to [info@altenburgadvisory.com](mailto:info@altenburgadvisory.com). Please use these contact details to exercise your rights as outlined in the “Your Rights” section above.

## **15. OTHER WEBSITES**

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **16. COMPLAINTS**

If you have any complaints about the way in which we collect, store and use your information, and these have not been addressed by contacting us first, you can contact the supervisory authority in the United Kingdom, the Information Commissioner's Office: <https://ico.org.uk/concerns/>

Last Updated: 23 March 2023