



CAPITALSTEP

PRIVACY POLICY

1	WHO WE ARE.....	2
2	DATA PROTECTION PRINCIPLES.....	2
3	SOME BASIC DEFINITIONS WE USE IN THIS POLICY.....	3
4	THE KIND OF PERSONAL INFORMATION WE HOLD ABOUT YOU.....	3
5	HOW IS YOUR PERSONAL INFORMATION COLLECTED?	3
6	HOW WE WILL USE PERSONAL INFORMATION.....	4
7	DIRECT MARKETING	5
8	CONSENT	6
9	AUTOMATED DECISION-MAKING	6
10	DATA SHARING.....	6
11	DATA SECURITY	7
12	DATA RETENTION	8
13	YOUR RIGHTS.....	8
14	COOKIES	10
15	INFORMATION OFFICER	10
16	CHANGES TO THIS POLICY	10
17	CONTACT	10

PRIVACY POLICY

1 WHO WE ARE

We are Capital Step Holdings Limited, a company incorporated and registered in England and Wales with registered office at 7 Granard Business Centre, Bunns Lane, Mill Hill, London NW7 2DQ and company number 09959642 (the “Company” or “we” or “us”).

The Company and personal information: We are committed to lawful, fair and transparent processing of all personal information about our employees, customers, suppliers and other third parties during the course of our business activities. We will always comply with any applicable data protection legislation and we will ensure that collection and use of personal information is carried out in accordance with applicable data protection laws. The main law governing data protection is the General Data Protection Regulation (Regulation (EU) 2016/679 of 27 April 2016) known as the “GDPR”.

What this policy is: This policy (and any other documents referred to in it, together with any privacy notice displayed on our website) sets out the basis on which we will process any personal information about you or individuals generally - whether it's information we collect from those individuals or that is provided to us from other sources. This policy sets out rules on data protection and the legal conditions that must be satisfied when we obtain, handle, process, transfer or store personal information.

Notification: We comply with the Information Commissioner's Office notification.

Controlling and processing information: We are the controller of all personal information used in our business for our own commercial purposes. Sometimes though, we will process personal information on behalf of another data controller – and when this is the case, we will do so only in accordance with the instructions of that data controller and otherwise in accordance with the GDPR.

Why you should read this policy: It is important that you read this policy, together with any other documents referred to in it, so that you are aware of how any personal information relating to you will be dealt with by us.

2 DATA PROTECTION PRINCIPLES

We are accountable for demonstrating compliance with the GDPR's six principles of processing personal information. These provide that personal information we deal with must be:

- (a) processed fairly, lawfully and in a transparent manner;
- (b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- (c) adequate, relevant and limited to what is necessary;
- (d) accurate and, where necessary, kept up to date;
- (e) not kept for longer than necessary; and
- (f) processed securely, maintaining integrity and confidentiality.

3 SOME BASIC DEFINITIONS WE USE IN THIS POLICY

Personal information: In this policy, when we use the term “**personal information**” we mean any information relating to an identified or identifiable human being. (An “identifiable natural person” is one who can be identified, directly or indirectly, for example, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, biometric, mental, economic, cultural or social identity of that person).

Sensitive personal information: In this policy, when we use the term “**sensitive personal information**” we mean special categories of information which are personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying someone, data concerning health or data concerning someone’s sex life or sexual orientation.

4 THE KIND OF PERSONAL INFORMATION WE HOLD ABOUT YOU

We may collect, record, organise, structure, store, adapt, alter, retrieve, consult, use, disclose by transmission, disseminate or otherwise make available, align or combine, restrict, erase or destroy the following types of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers and personal email addresses.
- Job title and place of work and any work contact details if different to those referenced above
- Demographic information such as your postcode
- Date of birth
- Bank account or debit/credit card details

We do not collect, store or use sensitive personal information.

5 HOW IS YOUR PERSONAL INFORMATION COLLECTED?

In the course of our business, we may collect personal information directly from an individual:

- when you provide information in relation to services we might provide to you;
- when you submit an enquiry about our services;
- when you sign up to our mailing list; and
- when you provide personal information directly to members of our team.

We may also collect personal information about individuals from other sources such as brokers who refer potential clients to us:

We will only collect personal information to the extent that it is required for the specific purpose notified to individuals about whom we are collecting it (or where a third party, such

as our broker, advises us that they are able to provide the data to us lawfully) - and we will keep it only as long as is necessary.

6 HOW WE WILL USE PERSONAL INFORMATION

We will only use personal information when the law allows us to do so and relying on a relevant basis for lawful processing in each instance. We will use your personal information in the following circumstances, relying on the basis of processing indicated:

Basis of processing: Where we need to perform a contract we are about to enter into or have entered into with you.

- To provide you with information or services that you request from us (*contact details*).
- To carry out our obligations arising from any contracts entered into between you and us (*contact details, payment information and any information relating to personalisation status*).

Basis of processing: Where it is necessary for our legitimate interests (or those of a third party[, such as a client using our services]) and we have undertaken an assessment to determine that processing for those interests (listed below) does not outweigh your interests and fundamental rights, considering the nature and impact of the processing and any relevant safeguards we can put in place.

- To ensure that content from our website is presented in the most effective manner for you and for your device (*online identifiers, location data and other technical information*).
- To provide you with information or services that we feel may interest you (where you have consented to be contacted for such purposes, to the extent consent is required by law) (*contact details and any information relating to personalisation preferences*).
- To notify you about changes to our service (*contact details*).

Basis of processing: Where we need to comply with a legal or regulatory obligation.

- To retain basic transaction details for the purpose of tax reporting (*contact details and transaction history*).

Basis of processing: Where you have consented to the processing.

- To use non-essential cookies on our website (see “Cookies” section below for further information) (*online identifiers, location data and other technical information*). You have the right to withdraw consent to such use at any time by contacting us but please note that some or all parts of our website may no longer be accessible to you.
- To send you direct marketing communications via email, text message or telephone call (*contact details*). You have the right to withdraw consent to any such use at any time by contacting us.

Other issues about how we use personal information:

- 1) Please note that we may process your personal information for more than one lawful

basis depending on the specific purpose for which we are using your data. Please contact our Information Officer if you need details about the specific legal basis we are relying on to process your personal information – contact details are below.

- 2) We will only use your personal information for the purposes for which we collected it [(or were asked to process it on behalf of one of our clients)], unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Please contact us if you would like further details of any additional purposes of processing. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis that allows us to do so.
- 3) Where we need to collect personal information by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). If this happens, we may have to cancel, or be unable to provide, any services you have requested.
- 4) Please note that we may process your personal information without your knowledge or consent where required or permitted by law.
- 5) We may collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal information but is not considered “personal data” in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your website usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this privacy policy.
- 6) If you provide us with any personal information relating to relatives, business partners or other individuals it is your duty to make such persons aware that their personal information may be shared with us and to provide them with appropriate information about how their personal information may be processed by us.

7 DIRECT MARKETING

As indicated above, we may use your personal information to provide you with information about goods and services which may be of interest to you and we may contact you about these by email, text message, post or telephone call. This is known as direct marketing.

Examples of direct marketing may include:

- sending promotional emails about new services, recent deals, customer events or other information which we think you may find useful or interesting using the email address which you have provided;
- contacting you for market research purposes (by email, text message or telephone call).

We will only process personal information for the above purposes as permitted by law, which usually means with your specific consent. You have the right to withdraw this consent at any time. Information about how to withdraw your consent is set out below.

We may also disclose your information to third parties (including our subsidiaries, our ultimate holding company and its subsidiaries for the purpose of direct marketing. Again, we will only do this with your explicit consent and you have the right to withdraw this consent at any time. Information about how to withdraw your consent is set out below. Please see "Data Sharing" below for further details.

8 CONSENT

In this policy, where we have referred to needing your consent for any processing, we will make sure that the consent:

- is specific consent for one or more specified purposes; and
- is given by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of your agreement to the relevant processing of personal information.

9 AUTOMATED DECISION-MAKING

Automated decision-making takes place when an electronic system uses personal information to make a decision relevant to you without human intervention. We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

10 DATA SHARING

Transfer of personal information outside of the EEA: We may transfer certain personal information that we hold on individuals living in the European Union to a country outside the European Economic Area ("EEA"), provided that one of the following conditions applies:

- the country to which the personal information is transferred ensures an adequate level of protection for that individual's rights and freedoms;
- an individual has given their explicit and informed consent having had the risks explained to them;
- the transfer is covered by one of the derogations set out in the GDPR, including the performance of a contract between us and that individual, or to protect the vital interests of individuals;
- the transfer is legally required on important public interest grounds or for the establishment, exercise or defence of legal claims; or
- the transfer is authorised by the relevant data protection authority where we have checked adequate safeguards exist with respect to the protection of the individual's privacy, their fundamental rights and freedoms, and the exercise of their rights.

Subject to the requirements set out above, the personal information we hold may also be processed by individuals operating outside the EEA who work for us or for one of our suppliers. Those individuals may be engaged in, among other things, the fulfilment of contracts with the relevant individual, the processing of payment details and the provision of support services.

Safeguards: If we use a third party data processor to process personal information on our behalf, we will obtain contractual commitments to safeguard the security of the personal

information to ensure that the third party only acts on our instructions when using that personal information and that the third party has in place appropriate technical and organisational security measures to safeguard the personal information. Whenever we transfer your personal information out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We may transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see ***European Commission: Adequacy of the protection of personal data in non-EU countries.***
- Where we use service providers, we may use specific contracts approved by the European Commission which give personal information the same protection it has in Europe. For further details, see ***European Commission: Model contracts for the transfer of personal data to third countries.***
- Where we use service providers based in the US, we may transfer data to them if they are part of the Privacy Shield, which requires them to provide similar protection to personal information shared between Europe and the US. For further details, see ***European Commission: EU-US Privacy Shield.***

Please contact us if you want further information on the specific mechanism used by us when transferring your personal information outside the EEA.

Why we might share your personal information with third parties: We may share personal information we hold with: (i) any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries; and/or (ii) in the event that we sell or buy any business or assets, or sell the Company, we will disclose your personal data to the prospective seller or buyer of such business or assets. We may also disclose personal information we hold to third parties if we are under a duty to disclose or share an individual's personal information in order to comply with any legal obligation, or in order to enforce or apply any contract with that individual or other agreements; or to protect our rights, property or safety of our employees, customers or others. This includes exchanging personal information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We may share personal information with other members in the group as part of our regular reporting activities on company performance. When appropriate, we will anonymise personal information when used for performance reviewing and reporting activities.

We may also share personal information we hold with selected third parties for the purposes set out below. We do not allow our third-party service providers to use your personal data for their own purposes; we only permit them to process your personal data for specified purposes and in accordance with our instructions.

Third party service providers who may process your personal information: When we use the term "third party", we mean any entity who is not the Company, including third party service providers, contractors and designated agents and any member of our group. Currently the only third party service providers who may process personal information on our behalf are our hosting companies from time to time, to the extent any personal data is made available via the website.

11 DATA SECURITY

We will always take appropriate technical and organisational measures to protect personal

information against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access, in particular where the processing involves the transmission of data over a network, and against all other unlawful forms of processing (including taking reasonable steps to ensure the reliability of employees who have access to personal information). Our employees may only process personal information in accordance with this privacy policy, and any employee who breaches this privacy policy may be subject to disciplinary action, up to and including dismissal.

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

12 DATA RETENTION

We will not keep personal information in a form which permits identification of individuals for longer than is necessary for the purpose or purposes for which they were collected. We will take all reasonable steps to destroy, or erase from our systems, all data which is no longer required. To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of personal information, the purposes for which we process information and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will only keep personal information for as long as is necessary for the purpose or purposes for which that personal information is processed; and we will let anyone about whom we process data know how long that is or the criteria that go into deciding how long that is.

We may sometimes anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Our website may, from time to time, contain links to and from the websites of 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 or the security of these websites. Please check the relevant policy before you submit any personal information to these websites.

13 YOUR RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal information, as summarised below.

You have the right to:

1. **Request access to your personal information** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
2. **Request correction of the personal information that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

3. **Request erasure of your personal information.** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
4. **Object to processing of your personal information where we are relying on a legitimate interest** (of our own or of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
5. **Request restriction of processing of your personal information.** This enables you to ask us to suspend the processing of your personal information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
6. **Request the transfer of your personal information to you or to a third party.** We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
7. **Withdraw consent at any time where we are relying on consent to process your personal information.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at **info@capitalstep.com** or contact our Information Officer as detailed below. We aim to respond to all legitimate requests within one month (and if we are only processing the data in question on behalf of another party, the response may actually come from that other party as the relevant data controller). Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive - alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to

any person who has no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response.

14 COOKIES

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer or device if you agree. Cookies contain information that is transferred to your computer or device.

Our website may in future use cookies to distinguish you from other users of our website. in order to provide you with a tailored experience when you browse our website and also allows us to improve our website. We do not currently use any cookies.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you block cookies you may not be able to access all or parts of any website using cookies.

15 INFORMATION OFFICER

[The person responsible for how the Company deals with personal information, our Information Officer, is responsible for ensuring compliance with GDPR and with this policy. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the Information Officer at **info@capitalstep.com** or by calling **+44 (0) 207 846 0144**.

16 CHANGES TO THIS POLICY

We reserve the right to change this policy at any time. Where appropriate, we will notify individuals of those changes by post or email. Each time you enter or use our website, you agree that the privacy policy current at that time shall apply to all information we hold about you.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

17 CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to **info@capitalstep.com**.

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the Information Commissioner's Office, so please contact us in the first instance.