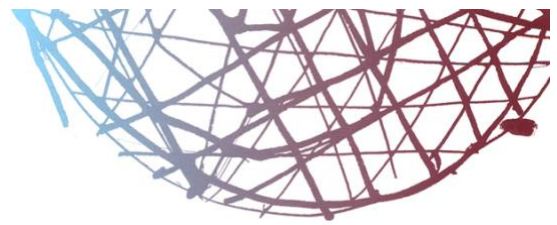


Abstract Securities

Website and Email Privacy Notice



1. INTRODUCTION

- 1.1. The Abstract Group of Companies (“the Company”, “we”) is committed to protecting the privacy and security of your personal information, and to compliance with all relevant data protection legislation, including, but not limited to, the Data Protection Act 2018, UK GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 1.2. The Abstract Group of Companies is the data controller for your information unless stated otherwise, this means we are responsible for, and control the processing of, your data. We are a registered data controller with the ICO (Registration Number: ZB292504).
- 1.3. We have appointed a Data Protection Lead (DPL) to oversee compliance with this privacy notice. If you have a question or concern about this notice or how we handle your personal information, please contact our DPL, Stephanie Miles by email at stephanie.miles@abstractsecurities.com, or by post at 10 Rose and Crown Yard, King Street, London, SW1Y 6RE.

2. SCOPE AND PURPOSE

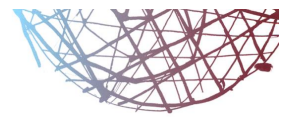
- 2.1. This notice applies to personal data we collect about you when you: contact us by phone, email or letter; conduct business with us; or, use our website (www.abstractsecurities.com).
- 2.2. The purpose of this notice is to explain how and why we collect and use personal information about you, and to inform you of your data protection rights.

3. DEFINITIONS

- 3.1. **Personal data** – any information that relates to a living individual who can be identified, directly or indirectly, from that information. This includes opinions or inferences about the person, it may include pseudonymised data but does not include anonymised data.
- 3.2. **Data processing** – any use that is made of personal data, including collecting, organising, storing, retrieving, amending, disclosing, restricting, or destroying it.

4. WHAT PERSONAL DATA WE MAY COLLECT AND HOW

- 4.1. **Directly from you** – when you contact us by email, phone or post or when you visit our website
 - 4.1.1. The information you give us may include: your name; address; email address; phone number; job title; and your employer, and, under limited circumstances, your gender; date of birth; and proof of identity.
 - 4.1.2. We may also keep a record of any correspondence.
- 4.2. **Automated collection** – when you access our website, certain information will automatically be recorded through the use of cookies and similar tracking devices. For more information, please see clause 5.
 - 4.2.1. This information may include: IP address, location data, browser type, and information about how you use the website, such as which page(s) you visit and how many times.
 - 4.2.2. Some of this data will be aggregated or statistical, which means we will not be able to identify you individually, and we will not combine analytics with other data in a way that would identify who you are.
- 4.3. **From third parties** – we work with third parties including business partners, analytics and technical service providers. We may obtain personal data from these third parties, they should explain to you in what circumstances your information will be shared with us.



5. COOKIES AND SIMILAR TECHNOLOGIES

5.1. Our website uses cookies and similar technologies, which are small files or pieces of text that download to your device when you access a website or app.

5.2. ***Functional and required cookies***

Squarespace, our hosting platform, uses the following cookies to allow you to access and use our site:

5.2.1. **Crumb** (session) – prevents cross-site request forgery, this is an attack vector that tricks a browser into taking unwanted action in an application when someone's logged in.

5.2.2. **Test** (session) – investigates if the browser supports cookies and prevents errors.

5.2.3. **Squarespace-likes** (persistent) – shows when you've already "liked" a News post.

For more information, please see the cookies Squarespace uses [here](#).

5.3. ***Third party/embedded content***

Our website includes some third-party applications and services to enhance your experience. Cookies may be set and used by these third parties. We do not have access to, or control over the data collected, and cannot prevent third-party services from setting cookies. These include:

5.3.1. **Sharing buttons** – some pages include 'share' buttons to enable you to easily share items on third-party sites (e.g. Facebook and LinkedIn) which may set cookies. For more information please see the privacy statements of the relevant third party.

5.3.2. **Vimeo** – we embed videos from Vimeo. When you press "play" Vimeo will drop third party cookies to enable the video to play and to collect analytics data such as how long a viewer has watched the video. These cookies do not track individuals. For more information please see Vimeo's Cookies Policy [here](#).

5.4. ***Other tracking codes***

Our website contains a tracking code provided by A1WebStats, this uses IP tracking to identify companies and is not the same as cookies.

5.4.1. It enables A1WebStats to track website activity and provide us with information about the visitor's IP address, which pages have been visited, when and for how long.

5.4.2. The code only provides publicly available information about which companies have visited our website by identifying them from their IP address. It does not, and cannot, provide individual, personal or sensitive data regarding who has visited our website.

5.4.3. This data may be used by us, or our agents, to contact the company about their experience or for marketing purposes.

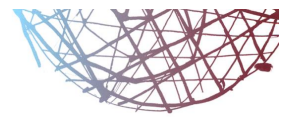
5.4.4. The information generated will be transmitted and stored by A1WebStats. For more information, please see A1WebStats' Privacy Policy which is available [here](#).

5.5. ***Your choices***

5.5.1. Because we do not place any non-essential cookies there are no cookie management preferences. However, most web browsers allow some control of cookies through the browser settings, for more information about this please visit your browser's help pages.

5.5.2. If you delete cookies or refuse to accept them, you might not be able to use all the features or pages of our site and some pages might not display properly.

5.5.3. For more information about cookies visit allaboutcookies.org.



6. WHY WE PROCESS YOUR DATA

We will process your personal data on the following lawful bases, for the following purposes:

6.1. **In relation to a contract:**

- 6.1.1. To deal with and/or respond to any enquiry or request made by you, prior to entering into a contract or agreement with us, or as a result of such a contract or agreement; or
- 6.1.2. When it is necessary to perform a contract we have with you, including the operation and delivery of any services you have requested.

6.2. **In accordance with our legitimate interests:**

- 6.2.1. To deal with and/or respond to any enquiry or request made by you;
- 6.2.2. To gather feedback to improve and develop our services;
- 6.2.3. For research and statistical analysis;
- 6.2.4. To notify you about new projects or opportunities which we believe may be of interest as a result of our previous or current dealings with you;
- 6.2.5. For visitor profiling: to provide you with personalised communication; and
- 6.2.6. To ensure the security and integrity of our website.

6.3. **To comply with our legal obligations:**

- 6.3.1. For example, for fraud prevention and detection.

6.4. **With your consent:**

- 6.4.1. To provide marketing or other information to you, or to allow our property agents, and occasionally other partners, to do so;
- 6.4.2. To notify you about new projects or opportunities; and
- 6.4.3. To personalise and improve your experience of our website.

Where we wish to use your personal information for a different purpose, we will notify you and, where appropriate, seek your consent to that activity.

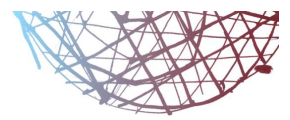
7. HOW WE HANDLE AND PROTECT YOUR DATA

7.1. **Data storage**

- 7.1.1. We don't routinely transfer your personal data out of the European Economic Area (the "EEA"), but if this were necessary, e.g. if one of our suppliers or employees were located outside the EEA, we would take reasonable care to ensure that such transfers were secure.
- 7.1.2. By submitting your personal data, you agree to this transfer, storage and processing.

7.2. **Data security**

- 7.2.1. We have implemented technical and organisational measures to safeguard your personal data, e.g. we store your personal data on secure servers and we have Cyber Essentials certification. We also take steps to ensure that any third parties we deal with keep all personal data they process on our behalf secure.
- 7.2.2. We will take all reasonable steps to ensure your data is treated securely and in accordance with this privacy notice, but use of the internet is never entirely secure. Therefore, we cannot guarantee the security or integrity of any personal data which is transferred from/to you via the internet, and any data transmission is at your own risk.



7.3. ***Data sharing***

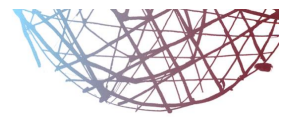
- 7.3.1. Your information may be shared internally where necessary or where required by law.
- 7.3.2. We will only share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so (as outlined in clause 6.2.). We will not sell or rent your data to third parties.
- 7.3.3. We take reasonable steps to ensure that any such processing is in line with the relevant law, and subject to a legal agreement containing suitable security measures, e.g. they can only process data in accordance with our instructions and they are obliged to implement appropriate technical and organisational measures to ensure data security.
- 7.3.4. Third parties who process data on our behalf include our:
 - a. IT service providers – BCN Group;
 - b. Website service providers – EMR;
 - c. Property agents – including CBRE, DTRE, Knight Frank and Savills;
 - d. Legal advisers – Pinsent Masons; and
 - e. Accounting and finance providers – Azets Holdings, KPMG, and Hobson Consulting.

7.4. ***Data retention***

- 7.4.1. We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements (and will ensure any third parties do the same).
- 7.4.2. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of the data, the purposes for which we process the data and if we can achieve those purposes through other means, and the applicable legal requirements.

8. YOUR RIGHTS

- 8.1. Under certain circumstances you have the right to:
 - 8.1.1. Request a copy of your personal data and information about how it is processed;
 - 8.1.2. Request that anything inaccurate in your personal data is corrected;
 - 8.1.3. Request the transfer of your personal data to you or a third party;
 - 8.1.4. Raise an objection about how your personal data is processed;
 - 8.1.5. Request that your personal data is erased if we no longer have justification to retain it;
 - 8.1.6. Ask that the processing of your personal data is restricted; and
 - 8.1.7. Withdraw consent if we are relying on consent to process your personal data.To find out more, visit the Information Commissioner’s Office website on [individual rights](#).
- 8.2. To exercise any of these rights, please send a written request to the DPL at 10 Rose and Crown Yard, King Street, London, SW1Y 6RE or stephanie.miles@abstractsecurities.com.
 - 8.2.1. We may request specific information from you to help us confirm your identity.
 - 8.2.2. We will not charge you for this unless your request is ‘manifestly unfounded or excessive or repetitive’.
- 8.3. You also have the right to lodge a complaint with the Information Commissioner’s Office, if you believe that we have not complied with your data protection rights, further information can be found on their website at www.ico.org.uk or via their helpline on 0303 123 1113.



9. OTHER MATTERS

- 9.1. **External links** – our website contains links to other websites. This privacy policy only applies to this website (www.abstractsecurities.com and any website URL starting with www.abstractsecurities.com/). If you follow a link to any of these other websites, they will have their own privacy policies and we accept no responsibility or liability for these sites.
- 9.2. **Complaints and contact** – if you have a question about anything in this privacy notice, or you have a complaint about how we have collected or processed your personal data, you can contact our DPL, by post at 10 Rose and Crown Yard, King Street, London, SW1Y 6RE or email at stephanie.miles@abstractsecurities.com.
- 9.3. **Changes to this privacy notice** – we will regularly review this notice to ensure it remains accurate and up to date and we may amend it at any time. We will place any updates on this web page, and any changes to this notice will apply to you and your data immediately. From time to time we may notify you about the processing of your personal information in other ways. This privacy notice was last updated on 10th February 2022.