

**CHF MEDIA GROUP, ALL SUBSIDIARY COMPANIES AND ALL INVESTEE COMPANIES: DATA PROTECTION POLICY**

**INTRODUCTION**

Our organisation is committed to protecting the rights and freedoms of individuals and safely and securely processing their data in accordance with all of our legal obligations. Through the course of our business, we may hold personal data about our employees, clients, suppliers and other individuals for a variety of purposes.

This policy sets out how we seek to protect personal data and ensure that individuals understand the rules governing their use of the personal data.

This Data Protection Policy has been updated in accordance with the provision of GDPR (please see definition below).

**DEFINITIONS**

<b>GENERAL DATA PROTECTION REGULATION (GDPR)</b>	Means regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
<b>Business Purposes</b>	<p>The purposes for which personal data may be used by us includes:</p> <ul style="list-style-type: none"> <li>• Regulatory</li> <li>• Financial</li> <li>• Administrative</li> <li>• Personnel including Employee Payroll</li> <li>• Contacting individuals as part of a business relationship or services arrangement; and</li> <li>• Business Development purposes, including Marketing.</li> </ul> <p>Business purposes include the following:</p> <ul style="list-style-type: none"> <li>• Compliance with our legal, regulatory and governance obligations and best practices.</li> <li>• Gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or such requests.</li> <li>• Ensuring business policies are adhered to (such as policies covering email and internet use).</li> <li>• Operational reasons, such as recording transactions, training and quality control, ensuring the confidentiality of commercially sensitive information, security vetting, credit scoring and checking.</li> <li>• Investigating complaints of a regulatory nature as well as a business nature, including complaints relating to employee conduct.</li> <li>• Checking references, ensuring safe working practices, monitoring and managing employee access to systems and facilities and employee absences, administration and assessments.</li> </ul>

	<ul style="list-style-type: none"> <li>• Monitoring employee conduct and employee disciplinary matters</li> <li>• Marketing our business and improving our services</li> </ul>
<b>Personal Data</b>	<p>‘Personal data’ means any information relating to an identified or identifiable natural person (‘data subject’).</p> <p>An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as:</p> <ul style="list-style-type: none"> <li>• a name</li> <li>• an identification number (for example, a passport number)</li> <li>• location data</li> <li>• an online identifier or;</li> <li>• one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.</li> </ul> <p>Personal data we gather may include:</p> <ul style="list-style-type: none"> <li>• Individuals' Personal Information such as Name, Address, Date of Birth, Telephone Numbers and Email Address.</li> <li>• Individuals Additional Information such as Educational Background, Financial and Employment details, Marital Status, Nationality, Job Title, CV, Directorships and Private Shareholdings, as may be provided to us in application forms for example</li> </ul>
<b>Data controller</b>	<p>‘Data controller’ means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by law.</p>
<b>Data processor</b>	<p>‘Processor’ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.</p>
<b>Processing</b>	<p>‘Processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.</p>
<b>Supervisory authority</b>	<p>This is the national body responsible for data protection. The supervisory authority for our organisation is the Information Commissioners Office.</p>

## **THE PRINCIPLES**

Our organisation shall comply with the principles of data protection (the Principles) enumerated in the EU's GDPR. We will make every effort possible in everything we do to comply with these principles

The Principles are:

### **1. Lawful, fair and transparent**

Data collection must be fair, for a legal purpose and we must be open and transparent as to how the data will be used

### **2. Limited for its purpose**

Data can only be collected for a specific purpose

### **3. Data minimisation**

Any data collected must be necessary and not excessive for its purpose

### **4. Accurate**

The data we hold must be accurate and kept up to date

### **5. Retention**

We cannot store data longer than necessary

### **6. Integrity and confidentiality**

The data we hold must be kept safe and secure

## **DATA RETENTION**

Data held by the firm will be in line with any legal obligations including those Data Retention periods defined under respective countries legal frameworks. Predominantly for our organisation, this will be under the United Kingdom's Financial Conduct Authority ("FCA") handbook for financial services regulatory purposes. There may be instances where other regulatory bodies require the firm to retain data for periods that may differ from the FCA handbook

## **DATA STORAGE**

All data will be held on servers held by our organisation, with back up servers located in the United Kingdom. The firm does not hold data on any cloud-based servers

## **DATA ACCESS**

Authorised individuals within the firm will have access to varying levels of personal data. The firm's Senior Management Team manages these access rights

## **TRANSFERRING DATA**

Our organisation may transfer information about you to other group companies for purposes connected with our services, transfer data into the European Economic Area (“EEA”) and outside of the EEA to comply with our legal or contractual requirements. Our organization will only transfer data where we are legally or contractually obliged to, and where safeguards are in place to ensure data is respected and handled lawfully at all times

## **INDIVIDUALS RIGHTS**

Individuals have rights to their data which may be exercised in the following ways:

### **1. Right to be informed**

- Individuals will receive privacy notices which are concise, transparent, intelligible and easily accessible, free of charge, which are written in clear and plain language

### **2. Right of access**

- Individuals will be able to access their personal data and supplementary information upon request
- Individuals will be allowed to understand and be aware of and verify the lawfulness of the processing activities
- This will be completed without delay, and no later than within 4 weeks. This may be extended to two months if the firm is able to adequately justify such an extension
- You will be informed accordingly within the initial 4-week period if an extension is to be applied

### **3. Right to rectification**

- Personal Data must be rectified or amended if requested because it is inaccurate or incomplete
- Where the firm disagrees please note individuals will receive:
  - the reasons we are not taking action;
  - your right to make a complaint to the ICO or another supervisory authority; and
  - your ability to seek to enforce this right through a judicial remedy if applicable.
- This will be completed without delay, and no later than within 4 weeks. This may be extended to two months if the firm is able to adequately justify such an extension
- You will be informed accordingly within the initial 4-week period if an extension is to be applied

### **4. Right to erasure**

- Individuals data will be deleted upon request when there is no compelling reason for its continued processing
- The firm will respond within 4 weeks to notify any reason why it is required to continue to hold the Personal Data. Where the firm disagrees please note individuals will receive:
  - the reasons we are not taking action;
  - your right to make a complaint to the ICO or another supervisory authority; and
  - your ability to seek to enforce this right through a judicial remedy if applicable

- Where the firm agrees with the request, this will be completed without delay, and no later than within 4 weeks. This may be extended to two months if the firm is able to adequately justify such an extension. You will be informed accordingly within the initial 4-week period if an extension is to be applied

#### **5. Right to restrict processing**

- Individuals may request for their Personal Data to be restricted, blocked or otherwise suppress the processing of their Personal Data

#### **6. Right to data portability**

- Individuals can request their data so that they can reuse it for their own purposes or across different services
- This data will be provided in a commonly used, machine-readable format, and be sent directly to another controller if requested by the individual

#### **7. Right to object**

- Individuals may request the objection to data processing based on legitimate interest or the performance of a public interest task
- Individuals may request the objection to direct marketing, including profiling
- Individuals may request the objection to processing their data for scientific and historical research and statistics

#### **8. Rights in relation to automated decision making and profiling**

- Individuals may request further information on how we undertake automated decision making and profiling
- Individuals have the right to object to such automated processing, have the rationale explained to them and request human intervention

### **REQUESTS AND QUERIES**

If any individual has a request or any query relating to Personal Data and Data Protection the firm can be contacted via the following methods:

**You can send an email to this address:** [adrianwilkins@chfmedia.com](mailto:adrianwilkins@chfmedia.com) (Adrian Wilkins)

**You can send a letter to this office address:**

CHF Enterprises Limited  
2 Hurle Road  
Clifton  
Bristol  
BS8 3LN

We will respond within 72 hours of receipt of any queries received

Please refer to the time frames noted above noted under “Individual’s Rights” in relation to Rights to Access, Rectification and Erasure of data which go beyond the 72-hour response timeframe

## **PRIVACY POLICIES**

A privacy notice will be supplied at the time the data is obtained if obtained directly from the data subject via a tick box on our application forms for example. If the data is not obtained directly from the data subject, the privacy notice must be provided within a reasonable period of having obtained the data, which means within 4 weeks

If the data is being used to communicate with the individual, then the privacy notice must be supplied at the latest when the first communication takes place

If disclosure to another recipient is envisaged, then the privacy notice must be supplied prior to the data being disclosed

## **THIRD PARTY DATA CONTROLLERS AND DATA PROCESSORS**

We may use third party Data Controllers and, or, Data Processors for the purpose of carrying out our business activities. In these instances, the firm will have carried out appropriate due diligence in order to ascertain guarantees under the GDPR, and that the rights of data subjects will be respected and protected

## **CHANGES TO THIS POLICY**

We may change this policy from time to time. Any significant changes will be notified through electronic communication to recipients with whom our organisation holds an email address. In the instance where an email address is not held, notification will be sent to a registered address