



## BOLD AND REEVES LIMITED

### PRIVACY POLICY

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do this we are subject to the UK General Data Protection Regulation (UK GDPR). We are also subject to the EU General Data Protection Regulation (EU GDPR) in relation to goods and services we offer to individuals in the European Economic Area (EEA), and to Switzerland's Federal Act on Data Protection (FADP) in relation to data processing we conduct which has an effect in Switzerland.

#### Key terms

Here is an explanation of some key terms used in this policy:

We, us, our	<b>Bold and Reeves Limited</b> , a company incorporated in England and Wales whose registered number is 08177776 and whose registered office is at 52 Mount Street, London, W1K 2SF
Our data protection contact	Bill Shipton – bill.shipton@boldandreeves.co.uk
Controller and Responsible Body	Bold and Reeves Limited is the data controller and body responsible for data processing
Personal data	Any information relating to an identified or identifiable individual
Data subject	The individual who the personal data relates to

#### Personal data we collect about you

The personal data we collect about you depends on the particular services we provide to you. We will collect and use the following personal data about you:

- Identity and Contact Data - your name and contact information, including email address
- Usage Data - information about how you use our services
- Technical Data - internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our services.

We collect and use this personal data for the purposes described in the section '**How and why we use your personal data**' below. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

#### How your personal data is collected

We collect most of this personal data directly from you or the company that you work for via our services.



However, we may also collect from a third party with your consent, e.g. via our IT systems, e.g. through automated monitoring of our services including our websites and other technical systems, such as our computer networks and connections, communications systems and email.

### How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- where you have given consent;
- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract; or
- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

The table below explains what we use your personal data for and why.

<b>What we use your personal data for</b>	<b>Our reasons</b>
Providing services to you	To perform our contract with you or to take steps at your request before entering into a contract
Preventing and detecting fraud against you or us	For our legitimate interest, i.e. to minimise fraud that could be damaging for you and/or us
To enforce legal rights or defend or undertake legal proceedings	Depending on the circumstances: - to comply with our legal and regulatory obligations - in other cases, for our legitimate interests, i.e. to protect our business, interests and rights
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
Statistical analysis to help us manage our business	For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
Preventing unauthorised access and modifications to systems	Depending on the circumstances:

	<ul style="list-style-type: none"> <li>- for our legitimate interests, i.e. to prevent and detect criminal activity that could be damaging for you and/or us</li> <li>- to comply with our legal and regulatory obligations</li> </ul>
Protecting the security of systems and data used to provide the services	<p>To comply with our legal and regulatory obligations</p> <p>We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, i.e. to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us</p>
Updating customer records	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>- to perform our contract with you or to take steps at your request before entering into a contract</li> <li>- to comply with our legal and regulatory obligations</li> <li>- for our legitimate interests, e.g. making sure that we can keep in touch with our customers about existing orders and new products</li> </ul>
<p>To share your personal data with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency</p> <p>In such cases information will be anonymised where possible and only shared where necessary</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>- to comply with our legal and regulatory obligations</li> <li>- in other cases, for our legitimate interests, i.e. to protect, realise or grow the value in our business and assets</li> </ul>

### Who we share your personal data with

We routinely share personal data with third parties we use to help deliver our services to you, e.g. developers and third-party cloud storage providers who are responsible for hosting, managing, and securing the data used in our services.

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data.

We or the third parties mentioned above occasionally also share personal data with:

- our external auditors, e.g. in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations;



- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency - usually, information will be anonymised but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations.

We will not share your personal data with any other third party unless we notify you in advance and such sharing is essential for the provision of the services to you.

If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' below).

### **Where your personal data is held**

Personal data is held via cloud storage which is a mode of storage that allows digital data to be stored on services at off-site locations. These services are maintained by our third party service providers as described above (see above: '**Who we share your personal data with**').

Some of these third parties may be based outside the UK/EEA. For more information, including on how we safeguard your personal data when this happens, see below: '**Transferring your personal data out of the UK and EEA**'.

### **How long your personal data will be kept**

We will not keep your personal data for longer than we need it for the purpose for which it is used.

If you no longer have an account with us or we are no longer providing services to you, we will delete or anonymise your account data after 7 years.

Following the end of the of the relevant retention period, we will delete or anonymise your personal data.

### **Transferring your personal data out of the UK and EEA**

The EEA, UK and other countries outside the EEA and the UK, have differing data protection laws, some of which may provide lower levels of protection of privacy.

It is sometimes necessary for us to transfer your personal data to countries outside the UK and EEA. In those cases we will comply with applicable UK and EEA laws designed to ensure the privacy of your personal data.

As we are based in the UK we will also transfer your personal data from the EEA to the UK.

Under data protection laws, we can only transfer your personal data to a country outside the UK/EEA where:

- in the case of transfers subject to UK data protection law, the UK government has decided the particular country ensures an adequate level of protection of personal data (known as an '**adequacy regulation**') further to Article 45 of the UK GDPR. A list of countries the UK currently has adequacy regulations in relation to is available [here](#).
- in the case of transfers subject to EEA data protection laws, the European Commission has decided that the particular country ensures an adequate level of protection of personal data (known as an '**adequacy decision**') further to Article 45 of the EU GDPR. A list of countries the European Commission has currently made adequacy decisions in relation to is available [here](#).



- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you; or
- a specific exception applies under relevant data protection law.

Where we transfer your personal data outside the UK, we do so on the basis of an adequacy regulation or (where this is not available) legally approved standard data protection clauses recognised or issued further to Article 46(2) of the UK GDPR. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time, we will not transfer your personal data outside the UK unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law and reflected in an update to this policy.

Where we transfer your personal data outside the EEA we do so on the basis of an adequacy decision or (where this is not available) legally approved standard data protection clauses issued further to Article 46(2) of the EU GDPR. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your personal data outside the EEA unless we can do so on the basis of an alternative mechanism or exception provided by applicable data protection law and reflected in an update to this policy.

Where we are acting as a data processor, we will transfer data across borders in accordance with applicable data protection laws, and will take appropriate measures to ensure that the required level of data protection is guaranteed in the third country or by the recipient in the third country.

Any changes to the destinations to which we send personal data or in the transfer mechanisms we rely on to transfer personal data internationally will be notified to you in accordance with the section on '**Changes to this privacy policy**' below.

If you would like further information about data transferred outside the UK/EEA, please contact us (see '**How to contact us**' below).

## Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data - in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party - in certain situations
To object	The right to object: - at any time to your personal data being processed for direct marketing (including profiling);

	- in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
The right to withdraw consents	If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time. You may withdraw consents by contacting us (see ' <b>How to contact us</b> ' below) .  Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn

For more information on each of those rights, including the circumstances in which they apply, please contact us (see '**How to contact us**' below) or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights](#).

If you would like to exercise any of those rights, please:

- email, call or write to us - see below: '**How to contact us**'; and
- provide enough information to identify yourself (e.g. your full name and email address);
- let us know what right you want to exercise and the information to which your request relates.

### **Keeping your personal data secure**

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. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures 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.

### **How to complain**

Please contact us if you have any queries or concerns about our use of your personal data (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with:

- the Information Commissioner in the UK; and
- a relevant data protection supervisory authority in the EEA state of your habitual residence, place of work or of an alleged infringement of data protection laws in the EEA

The UK's Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.



For a list of EEA data protection supervisory authorities and their contact details see [here](#).

The Swiss Federal Data Protection and Information Commissioner can be contacted [here](#).

### **Changes to this privacy policy**

This privacy notice was published on 28<sup>th</sup> February 2025.

We may change this privacy notice from time to time - when we do we will inform you via email and at the link <https://www.boldandreeves.com>

### **How to contact us**

You can contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are:

Bold and Reeves Limited

Address: 52 Mount Street, London, W1K 2SF

Email: [info@boldandreeves.co.uk](mailto:info@boldandreeves.co.uk) copied to Bill Shipton – [bill.shipton@boldandreeves.co.uk](mailto:bill.shipton@boldandreeves.co.uk)

Telephone: [+44 \(0\)20 7408 7590](tel:+44(0)2074087590)

### **Do you need extra help?**

If you would like this notice in another format (for example audio, large print, braille) please contact us (see 'How to contact us' above).