

PRIVACY POLICY

MHD Consulting respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

1. Important information and who we are

This privacy policy gives you information about how MHD Consulting collects and uses your personal data belonging to you or your personnel in the context of providing consulting services to you or your business, through your use of the company's website and through any of the other ways we interact, as set out in more detail in paragraph 3 below.

The company's website is not intended for children and we do not knowingly collect data relating to children.

Controller

MHD Consulting Ltd. is the controller and responsible for your personal data (collectively referred to as **MHD Consulting, we, us** or **our** in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights (Paragraph 9), contact us using the information set out in the contact details section (Paragraph 10).

2. The personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes 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, device ID and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you interact with and use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly reveal your identity. For example, we may aggregate individuals'

Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

In certain circumstances, our collection of the different categories of data set out above may include the collection of **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). We also may collect **Criminal Convictions and Offences Data**.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of our engagement with you (as set out in our engagement letter and terms of business), and you fail to provide that data when requested, we may not be able to perform the services set out in the engagement letter.

3. How is your personal data collected?

We use different methods to collect data from and about you including:

- In the process of carrying out work for you (or your business) where we will in almost all instances act as a controller. In very limited circumstances we may act as a processor in which case we will let you know and ensure that an appropriate contract is put in place.
- When we communicate with you by email or other electronic correspondence, by telephone or using video conferencing software. You may give us your identity, contact and/or financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - make a request for our services;
 - create an account on our website;
 - subscribe to our publications;
 - request marketing to be sent to you;
 - complete a survey; or
 - provide us with feedback.
- Networking (for example, at in-person or virtual events).
- Through your use of our guest Wi-Fi service.
- By virtue of our access to CCTV footage.
- Otherwise through providing our legal services and operating our business.

We also collect data from and about you via our website:

- Through your actions (for example, when submitting a subscription form, when submitting a job application).
- Through automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may

also receive Technical Data about you if you visit other websites employing our cookies. See our cookie policy for further details.

- Through third parties or publicly available sources. We will receive personal data about you from various third parties and public sources.
 - Technical Data is collected from analytics providers, advertising networks, and search information providers,
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services,
 - Identity and Contact Data from data brokers or aggregators,
 - Identity and Contact Data from publicly available sources

which may be based inside or outside the UK.

4. How we use your personal data

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract (or engagement letter) we are about to enter into or have entered into with you.
- **Legitimate interests:** Where it is necessary for our legitimate interests as a legal services provider (or those of a third party) and your interests and fundamental rights do not override those interests. These legitimate interests include our interests in managing our relationship with our clients, prospective clients and their staff, hosting clients and others at our offices, hosting virtual and in-person events and ensuring appropriate standards and compliance with policies, practices or procedures.
- **Legal obligation:** Where we need to comply with a legal obligation to which we are subject.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.
- Where processing of "special category data" is necessary in the context of legal claims or where another legal ground other than explicit consent is available to us under relevant data protection legislation.
- Where our legal services require us to process "special category data" and where we have obtained your explicit consent to do so. If we seek and obtain your consent, you may withdraw it at any time.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Lawful basis
-------------	--------------	--------------

To check whether we can act for you as a new or existing client or across from you as a counter party or other third party on a matter involving a new or existing client, and carry out all of our regulatory compliance requirements, including conflicts of interest, anti-money laundering, anti-terrorism, sanctions, fraud and background screening	Identity Contact Financial Professional	Performance of a contract with you Necessary to comply with a legal or regulatory obligation Public interest Necessary for our legitimate interests (to detect and prevent the commission of fraud, money laundering and terrorism offences)
To deliver our services to you including engaging service providers, managing payments, fees and charges and collecting and recovering money owed to us	Identity Contact Financial Transaction Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy	Identity Contact Profile Marketing and Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers and clients use our products and services)
To enable you to complete a survey	Identity Contact Profile Usage Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (to study how customers and clients use our products and services, to develop them and grow our business)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Necessary to comply with a legal obligation

To deliver relevant website content to you and measure or understand the effectiveness of the marketing we provide to you	Identity Contact Profile Usage Marketing and Communications Technical	Necessary for our legitimate interests (to study how customers use our products and services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products and services, marketing, customer relationships and experiences	Technical Usage	Necessary for our legitimate interests (to define types of clients and customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	Identity Contact Technical Usage Profile Marketing and Communications	Necessary for our legitimate interests (to develop our products and services and grow our business)

Direct marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out of marketing

You can ask us or third parties to stop sending you marketing messages at any time.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes, for example relating to appointment reminders, checking that your contact details are correct.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, some parts of this website may become inaccessible or not function properly.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table [Purposes for which we will use your personal data] above.

- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

During the ordinary course of provisioning services, we do not transfer your personal data outside the UK.

Whenever we transfer your personal data out of the UK to countries which have laws that do not provide the same level of data protection as the UK law, we always ensure that a similar degree of protection is afforded to it.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see paragraph 9 below for further information.

In some circumstances we will anonymise your personal data (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.

9. Your legal rights

You have rights under data protection laws in relation to your personal data to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data 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.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data 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 data 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 data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see **Opting out of marketing** in paragraph 4 for details of how to object to receiving direct marketing communications).
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data 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.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - 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
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us (see Contact details (paragraph 10)).

No fee usually required

You will not have to pay a fee to access your personal data (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 could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could 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.

10. Contact details

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

- Email address: caglar.kokturk@mhd-consulting.co.uk
- Postal address: 63-66 Hatton Garden, Fifth Floor Suite 23, London, EC1N 8LE, United Kingdom

11. Complaints

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

12. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 29/04/2024.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

13. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.