

## **Privacy Policy**

This Privacy Policy explains how we process your personal data, including how we collect, use and process your personal data, and how, in doing so, we comply with our legal and regulatory obligations. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

This Privacy Policy applies to the personal data of Investors or other Clients, Suppliers, website users and others whose personal data The Manor of Bosham and The Hundred Limited (referred to as "The Manor of Bosham" or "us") may process. For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR")), the entity responsible for your personal data is The Manor of Bosham and The Hundred Limited at 5 Elstree Gate, Elstree Way, Borehamwood, Hertfordshire, WD6 1JD, United Kingdom.

Please note that this Privacy Policy may be amended from time to time.

## **GDPR Principles**

The following principles are complied with when processing personal data:

Data is processed fairly and lawfully

Data is processed only for specified and lawful purposes

Processed data is adequate, relevant and not excessive

Processed data is accurate and, where necessary, kept up to date

Data is not kept longer than necessary

Data is processed in accordance with an individual's consent and rights

Data is kept secure

Data is not transferred to countries outside of the European Economic Area (EEA) without adequate protection

## **Lawful Basis of Processing Data**

The lawful basis of processing of data will always be determined prior to any data being processed.

The applicable laws for processing personal data under the GDPR are as follows:

Consent – the individual has given their Consent to the processing of their personal data

Contractual – processing of personal data is necessary for the performance of a contract to which the individual is a party with The Manor of Bosham and The Hundred Limited

Legal Obligation – processing of personal data is necessary for compliance with a legal or regulatory obligation to which The Manor of Bosham and The Hundred Limited is subject

Legitimate Interests – processing of personal data is necessary under the Legitimate Interests of The Manor of Bosham and The Hundred Limited or a Third Party, unless these interests are overridden by the individual's interest or fundamental rights

Public Task – processing of personal data is necessary for the performance of a task carried out in the public interest or in the exercise of official authority

Vital Interests – processing of personal data is necessary to protect the vital interests of the individual or another individual

The Manor of Bosham processes personal data under one, or more, of the following Lawful Bases:

- Consent
- Contractual Interest
- Legal Obligation
- Legitimate Interest

## **Type of Personal Data Being Processed**

The type of personal data being processed will typically include:

Name  
Address  
Email Address  
Job Title  
Telephone Number  
Business Name

## **How Personal Data is Collected**

Personal data is obtained from one or more of the following:

Parties entering into agreements with The Manor of Bosham and The Hundred Limited or the clients that it advises

Parties approaching The Manor of Bosham and The Hundred Limited to inquire about potentially investing on behalf of the clients it advises or other opportunities

Requests for information about services offered by The Manor of Bosham and The Hundred Limited and Employment inquiries at The Manor of Bosham and The Hundred Limited

## **Why Personal Data is Collected**

Personal data is collected to provide legitimate business services which include:

For Business purposes, for example consolidated reporting

To meet statutory monitoring and reporting responsibilities

To improve The Manor of Bosham and The Hundred Limited services and service offering

Where indicated, however, some of the information is optional and you can choose not to complete.

## **How Personal Data is Used**

Personal data may be used to:

- Process requests for further information, to maintain records and to provide ongoing service levels
- Carry out our obligations arising from any contracts entered into by you and us
- Comply with legal requirements including anti-money laundering checks
- We may need to pass the information we collect to other companies for administrative purposes
- We may use third parties to carry out certain activities, such as processing and sorting data, monitoring how customers use our site and issuing our emails for us
- Notify you of changes to our services
- Send you communications which you have requested or that may be of interest to you. These may include information about investment opportunities or events.
- To inform you of various services that may be of interest to you
- Process a job application

## **Where Personal Data is Stored**

Information collected is stored on the on the Company's server.

As part of any services offered by The Manor of Bosham and The Hundred Limited, information provided may be transferred to countries outside the European Economic Area ('EEA') i.e. our servers, or third-party servers that are used to provide The Manor of Bosham services located in a country outside the EEA. By submitting your data, you consent to the transfer, storage and/or processing of your data wherever it be stored. However, if your data is transferred outside the EEA, steps will be taken to ensure appropriate security measures are in place to ensure your privacy rights continue to be protected as outlined in this Policy.

The Manor of Bosham and The Hundred Limited does not collect information about specific users of its website. It does however use Google analytics cookies which collect information in an anonymous form, including the number of visitors to the site, the IP address of the visitor, time zone, where visitors have come to the site from and the pages they visited. As with many websites, this information can be used to compile statistic reports of our users' browsing patterns so that we can improve our website and enhance user experience of it. If you change your user settings so that Cookies are switched off then your previous browsing history will no longer be available to The Manor of Bosham and The Hundred Limited.

### **How long Personal Data is Stored**

We review our retention periods for personal data periodically. We are legally required to hold some types of information to fulfil our statutory obligations. We will hold personal data on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

### **Who has Access to Personal Data**

Only The Manor of Bosham employees are granted access to client information. This is ensured by the use of strict operational processes and procedures.

Staff are trained on security systems and relevant processes and procedures which are reviewed regularly for ongoing effectiveness and suitability for purpose. All employees are kept up-to-date on The Manor of Bosham and The Hundred Limited security and privacy practices. Employees are notified and/or reminded about the importance we place on privacy, and what they can do to ensure that customer information is protected.

Non-sensitive details (your email address and other requested information) are transmitted normally over the Internet and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

We will not sell or rent your information to third parties.

### **Third-Party Service Providers working on our behalf:**

We may pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure.

Third-Party Product Providers we work in association with:

We work closely with various third-party service providers to ensure that the service we provide is

professionally managed and administered. In some cases, they will be acting as a data controller of your information and, therefore, we advise you to read their Privacy Policy. These third-party product providers will share your information with us which we will use in accordance with this Privacy Policy.

We may also further transfer data if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or to law enforcement. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

### **Individuals' Rights**

Different rules apply depending on the type of Lawful Processing being undertaken. Many of the following individuals' rights apply, however, whatever the basis of processing:

The right to be informed how personal data is processed

The right of access to their personal data

The right to rectification

The right to erasure

The right to restrict processing

The right to data portability

The right to object

Rights in relation to automated decision making and profiling

The accuracy of personal data is imperative. We aim to keep it updated at all times. The personal data we hold on you is available upon request by contacting [quay@manor-of-bosham.co.uk](mailto:quay@manor-of-bosham.co.uk) You can request that your data is updated and/or deleted at any time, unless The Manor of Bosham and The Hundred Limited can justify that it is retained for legitimate business or legal purpose. When updating your personal data, you may be asked to verify your identity before your request can be actioned.



The Manor of Bosham and The Hundred Limited Limited; registered in England No. 12192174.